



Biointermediates Reporting & RIN Generation

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Biointermediates workshop

Office of Transportation and Air Quality

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About this Presentation

- This presentation is being given to assist stakeholders in complying with the regulations regarding biointermediates finalized in the 2020-2022 RVO final rule.
- The presentation is not intended to discuss the merits of the regulatory requirements but rather to assist stakeholders in implementing them.
- To the extent participants provide questions, advice, or materials during or after this meeting, they should do so in their individual capacity.
- This presentation is not intended to supplant the regulatory requirements. Parties must comply with the applicable regulatory requirements regardless of whether and how those requirements are discussed in these presentations.
- The topics in this presentation do not represent future EPA decisions or actions in any particular circumstance and do not bind EPA to any particular decision or action.

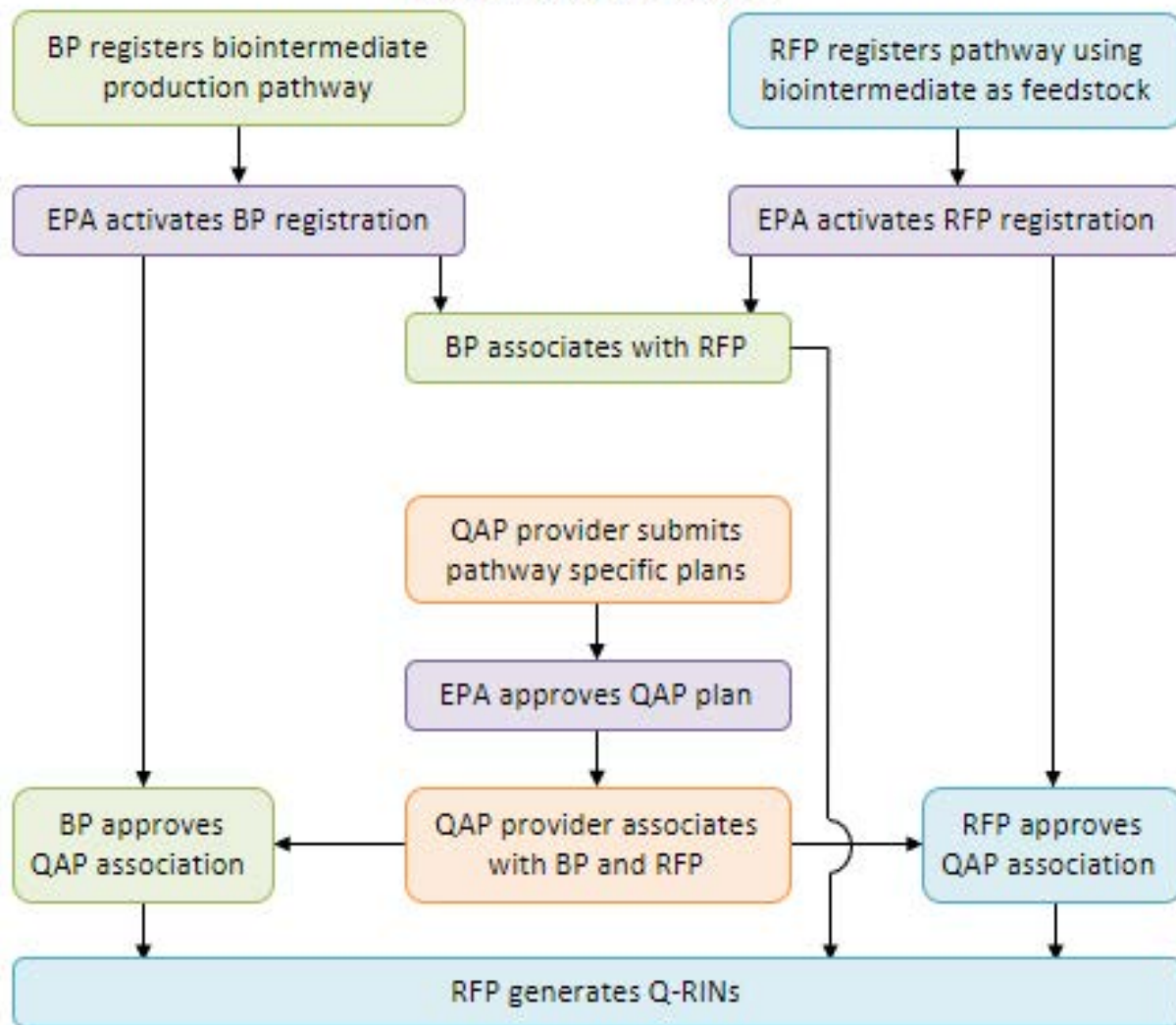
Who is required to report?

- Biointermediate Producers
- Renewable Fuel Producers (RIN generators)
- Third parties
 - QAP providers
 - Attest auditors

What reports are required?

- Compliance reporting – reports of activities that are signed and submitted to EPA quarterly
- EMTS – report RIN generation within five business days
- Attest engagement – auditor's full report and summary of findings, submitted annually

Registration process



Biointermediate Producer Requirements - Forms

- Biointermediates producers must submit a new form RFS4000 quarterly (one report per batch)
 - The form includes information such as company and facility registration number, production date, batch number and volume, types and quantities of feedstocks used, and information about the renewable fuel producer that received the batch.
 - A comprehensive list of the information required for reporting can be found in §80.1451(j)

<https://www.ecfr.gov/compare/2022-08-30/to/2022-08-29/title-40/chapter-I/subchapter-C/part-80/subpart-M/section-80.1451>

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	
1	## UNIFIED REPORT FORM v1.17				Updated: 09/15/2022																			
2	#N/A																							
3	## OMB Control Numbers by program Fuels Streamlining: 2060-0731; RFS: 2060-0637, 2060-0640, 2060-0688, 2060-0660, 2060-0707, 2060-0725; 2060-0728																							
4	## Select Column headers for reports in cell A7, these headers are provided along with the link to the reporting instructions for your convenience																							
5																								
6	## For RFS4000 report form instructions see:																							
7	##RFS4000	Report Type	CBI	Report Date	Compliance Period Year	Compliance Period Quarter	Biointermediate Company ID	Production Facility ID	RIN Generator Company ID	RIN Generator Facility ID	Batch Number	Batch Volume	Batch Volume Units	Production Date	Fuel Type (1)	Fuel Type D-Code (1)	Fuel Type (2)	Fuel Type D-Code (2)	Fuel Type (3)	Fuel Type D-Code (3)	Feedstock Code (1)	Feedstock Amount (1)	Feedstock Unit of Measure (1)	
8	##	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
9	RFS4000	o	Y	09/15/2022	2022	Q2	1234	00002	5678	12000	000001	15000	40	09/14/2022	10	5	100	4	NA	NA	13	20000	50	
10	RFS4000	o	Y	09/15/2022	2022	Q2	1234	00002	5678	12000	000002	20000	40	09/14/2022	20	6	NA	NA	NA	NA	13	20000	50	
11	RFS4000	o	Y	09/15/2022	2022	Q2	1234	00002	5678	12000	000003	12000	40	09/14/2022	40	4	30	4	NA	NA	13	20000	50	
12																								
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RFS2 Biointermediate Producers Batch Reports (RFS4000): Instructions for Completing

Who must report

- RFS2 Biointermediate producers that must submit batch reports under 80.1451(i)(2).

Reporting requirements

- Enter a separate report line for each batch of biointermediate.
- **Required fields and NA values** – Certain report fields or parameters may be specific to select product types or situations. If a report field does not apply to the reported batch, enter the value “NA”. Do not leave the field blank.

Reporting deadlines

- Producers shall report on a quarterly basis:

Production Calendar Quarter	Time Period Covered	Quarterly Report Deadline
Quarter 1	January 1 – March 31	June 1
Quarter 2	April 1 – June 30	September 1
Quarter 3	July 1 – September 30	December 1
Quarter 4	October 1 – December 31	March 31

How to submit reports

- Please check the RFS reporting web site for updated instructions and templates:
<https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-report-quarterly-and-annually-renewable-fuel>
- For information on submitting this report using EPA’s Central Data Exchange (CDX) visit:
<https://www.epa.gov/fuels-registration-reporting-and-compliance-help/user-guides-otaqdcfuel-central-data-exchange-cdx>

Biointermediate Producer Requirements - Attest Engagements

Biointermediate producers must obtain an annual attest engagement through the following:

- Associate with an attest auditor
- Auditor must submit an attest engagement by June 1 for previous compliance period (typically a calendar year)

Resources:

- List of required parts of an attest engagement: <https://www.ecfr.gov/compare/2022-08-30/to/2022-08-29/title-40/chapter-I/subchapter-C/part-80/subpart-M/section-80.1464>
- Link to more information about attest engagements: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-submit-attest-engagements-reports>

Note: Attest engagement forms and procedures will change in the future; please follow the above link for updated information.

Requirements for renewable fuel producers using biointermediates (RIN generators)

- Submit quarterly and annual compliance reports
 - See list of required reports here: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/list-all-quarterly-and-annual-reports-renewable>
 - No *new* reporting forms, rather existing reports have been updated to accommodate/include biointermediates
- Submit attest engagements, which have similar requirements to those of biointermediate producers

Requirements for renewable fuel producers using biointermediates (RIN generators), cont.

- Submit RIN transactions through EMTS (§80.1452)
 - Must provide the type and quantity of biointermediate used for each batch, and the EPA facility registration number for each biointermediate production facility at which a biointermediate used in the batch was produced.
- RIN generation will fail unless:
 - Registrations and associations are complete by all parties prior to generating RINs
 - QAP provider is the same for both the biointermediate producer and renewable fuel producer
 - Biointermediate producer has an approved pathway
 - There is an association between the biointermediate producer and the renewable fuel producer


Successful RIN generation example

Organization **Submissions** **Trades** **Reports** **RINs** **E-Signature**


Generate RINs - Report Fuel

Enter the fuel (D Code), batch characteristics and quantity of RINs generated. The fuel and production process must be registered with OTAQREG Fuels registration before reporting fuel. You must specify a Denaturant Volume if you are generating more than 40 gallons of Ethanol or Cellulosic Ethanol.

Report Fuel

- * **Fuel (D Code):** ▼
- * **Production Process:** ▼
- * **Production Date:** 
(MM-DD-YYYY)
- * **Fuel Category:** ▼
- * **QAP Service Type:** ▼

▼ RFS2 Transaction Bin

 Your organization has 0 un-submitted transactions in the RFS2 transaction bin.

[View RFS2 Transaction Bin](#)

1 Report Fuel

2 Report Feedstocks

3 Report Co-products

Successful RIN generation example, cont.

Feedstock	Quantity	Measure	Biointermediate Facility	Additional Information	Renewable Biomass
No feedstocks have been reported.					

Report Feedstocks

* Feedstock(Code): Udenatured ethanol (sourced from food waste)(14) ▼

Quantity: 1000

Unit of Measure: Cubic Feet ▼

Biointermediate Producer: JK Bio 09072022 (1670) ▼

Biointermediate Facility: FIM TEST FACILITY 1 (90741) ▼

Additional Information:

Does this feedstock meet the definition of renewable biomass in 40 CFR 80.1401?

Add

* = Required Field

<< Report Fuel Report Co-products >>

1 Report

2 Report

3 Report

Successful RIN generation example, cont.

Transaction Bin

A transaction that is acting upon a large number of RIN batches may take several minutes, causing your browser to timeout. Please be patient and do not submit another transaction until the transaction has completed.

Organizations

Selected Organization: JK RF Producer
09072022 (1671)

[Select a Different Organization](#)

Submit >>

Generate Transactions

Production Date	RIN Year	Fuel Category	Fuel (D Code)	QAP Service Type	Volume	Quantity	Equivalence Value	Status	Status Date	I want to...
09-05-2022	2022	Non-cellulosic Ethanol (EV 1.0)	Advanced Biofuel (D=5)	Q-RIN (10)	1000	1000		Ready	09-14-2022 9:07:55 AM EDT	-- Select -- <input type="button" value="Go"/>

Failed RIN generation example

EPA Moderated Transaction System

Organization Submissions Trades Reports RINs E-Signature

Generate RINs - Report Fuel

- 3070: The process 'Eligible Renewable Fuels From Non-Cellulosic Portions of Separated Food Wastes Process', the fuel (D-code) 'Advanced Biofuel', fuel category 'Non-cellulosic Ethanol (EV 1.0)', and the QAP service type 'Unverified' do not match a registered fuel pathway for generate facility '71344'. Please contact EPA for assistance.

Report Fuel

* Fuel (D Code): Advanced Biofuel (D=5) ▼

* Production Process: Eligible Renewable Fuels From Non-Cellulosic Portions of Sep ▼

* Production Date: 09-05-2022 (MM-DD-YYYY)

* Fuel Category: Non-cellulosic Ethanol (EV 1.0) (10) ▼

* QAP Service Type: **Unverified (30) ▼**

RFS2 Transaction Bin

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- 1 Report Fuel
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Failed RIN generation example

EPA Moderated Transaction System

Organization Submissions Trades Reports RINs E-Signature

Generate RINs - Report Fuel

QA Check Errors

- 3041: The fuel 'Advanced Biofuel' and fuel category 'Non-cellulosic Ethanol (EV 1.0)' are not compatible with 'Cellulosic Production Process'. Please review the EMTS transaction instructions for a list of processes that can be used for the production of 'Advanced Biofuel'.

Report Fuel

* Fuel (D Code): Advanced Biofuel (D=5) ▼

* Production Process: **Cellulosic Production Process(280)** ▼

* Production Date: 09-05-2022
(MM-DD-YYYY)

* Fuel Category: Non-cellulosic Ethanol (EV 1.0) (10) ▼

* QAP Service Type: Q-RIN (10) ▼

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Required Reports for QAP Providers

- Compliance reporting
 - RFS2000 – Batch Verification
 - RFS2200 – On-Site Audit Report
 - RFS2300 – List of Potentially Invalid RINs
 - RFS2400 – Mass Balance
- QAP reports have been modified to include biointermediates

Additional Resources

- EMTS job aids
 - <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-use-ems-report-transactions-fuel-programs>
- Reporting webpage available at
 - <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/list-quarterly-and-annual-reports-renewable-fuel>
- Fuels Program Support Helpdesk
 - FuelsProgramSupport@epa.gov
 - 1-800-385-6164
- Biointermediates webpage
 - <https://www.epa.gov/renewable-fuel-standard-program/workshop-biointermediates-compliance-2022>